

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
File No.: 5:16-CT-3301-FL

RODNEY A. KOON,  
Plaintiff,

v.

STATE OF NORTH CAROLINA and  
BRYAN K. WELLS,  
Defendants.

**MOTION FOR  
SUMMARY JUDGMENT**

NOW COME Defendants State of North Carolina and Bryan K. Wells (collectively, hereinafter “Defendants”), by and through undersigned counsel, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and hereby move for summary judgment as there exists no genuine issues of material fact which support Plaintiff’s claims of alleged violations of his constitutional rights by Defendants. In support of this motion, Defendants rely upon the pleadings filed in this case as well as the supporting materials filed herewith, including a Memorandum in Support of this Motion, which includes Declarations and exhibits.

Respectfully submitted this the 15th day of May, 2020.

JOSHUA H. STEIN  
Attorney General

/s/ Alex R. Williams

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Alex R. Williams (N.C.S.B. No. 41679)

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system and served the foregoing document on all non-CM/ECF participant(s) by depositing a copy in the U.S. Mail, postage prepaid, addressed as follows:

Rodney A. Koon  
Inmate No. 0229602  
PO Box 460  
Badin, NC 28009

This the 15th day of May, 2020.

/s/ Alex R. Williams  
Alex R. Williams  
Assistant Attorney General